

United States Bankruptcy Court
Southern District of New York

In re: Sears Holding Corporation, *et al.*,)
)
) Case No. 18-23538 (RDD)
)
) Chapter 11
)

OBJECTION TO *De Minimis* Sale AND BID for KMART STORE #26588

Arthur Schwartz has filed these papers with the Court and states through his attorney, as follows:

1. Mr. Schwartz of is an individual and resides at 405 Candlewood Commons, Howell, New Jersey 07731.
2. Mr. Schwartz is interested in the property of Kmart Store No. 26588 in Trotwood, Ohio. His plan will conform with developing the property to bring tax revenue and gentrification to the location.
3. The current sale contract is for \$70,000 and Mr. Schwartz believes this to be too low.
4. However, the property is evaluated for more than that.
5. Mr. Schwartz is now placing his offer for purchase at \$100,000. He is ready, willing, and able to close in the timeline, or thereabout, as was set forth in the proposed Sales Contract with Trotwood Community.
6. Upon approval of his bid for purchase, Mr. Schwartz will enter into a contract with the same terms, except for the purchase price, and put down \$5,000 of earnest money within 3 business days.

WHEREFORE, Mr. Schwartz, respectfully request an Order issuing the following relief:

- A. The Court should deny the *de minimis Sale*;
- B. The Court should accept Mr. Schwartz's bid; and
- C. Other such relief as the Court deems appropriate.

Sworn on July 31, 2019



By _____
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